

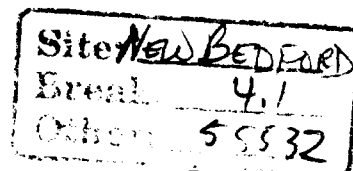


REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION CORPS OF ENGINEERS
424 TRAPELO ROAD
WALTHAM, MASSACHUSETTS 02154

September 22, 1986

Operations Division



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SEP 26 1986

REGION I
WASTE MGMT. DIVISION

cc: *Leavath*
murphy
9/26/86

Mr. Michael R. Deland
Regional Administrator
U.S. Environmental Protection Agency
J. F. Kennedy Federal Building
Boston, Massachusetts 02203

Dear Mr. Deland:

I am responding to requests of the New England Division made at our July meeting and subsequent discussions between our staffs concerning our involvement in the environmental documentation of the New Bedford Superfund project. These discussions have provided us a clearer understanding of your Superfund environmental review process and the role we will play in that process.

We understand that the product will be in conformance with the National Contingency Plan and may not match the usual product under our NEPA implementing regulations. As such, EPA will be responsible for the environmental documentation required under their regulations but have requested our technical assistance in three areas (performing Floodplain and Wetlands Assessments and providing technical environmental review as requested). We are considering these requests in light of our manpower capabilities and other program requirements and we will respond by the 1st week in October.

As an initial technical environmental review task we were asked to review various environmental documents to determine any "gaps" which the EPA approach was leaving relative to environmental considerations. From an overall perspective we do not at this point find any gaps (except Floodplain and Wetland Assessment) which we could identify through our review of the subject reports. The major tasks identified in the Draft Work Plan appear to provide an adequate analysis of the dredging and disposal alternatives. Our review

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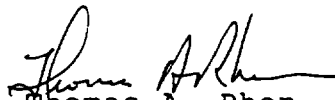
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REGIONAL ADMINISTRATOR

however, was conducted with limited knowledge of the detailed work items to be included in a number of the major tasks. In some cases the scopes of work for these items have not been developed, therefore until these detailed task items are available our review must be limited to information given in the work plans. Development of the detailed scopes of work and the interrelationship of the major tasks will require careful/continuous coordination between EPA's Project Manager and his study contractors to prevent "gaps". For details of the review and specific questions raised see attachment.

We appreciate the opportunity to assist you in this complex process and await your further decision on our technical environmental involvement. If you have any questions, please contact me at 617-647-8220 or you may contact Mr. Alan Randall at 617-647-8055.

Sincerely,



Thomas A. Rhen
Colonel, Corps of Engineers
Division Engineer

Attachment

Copy furnished:
Mr. William Bonneau
USACE, Omaha District

New Bedford Harbor Superfund Study Environmental Review

1. On 19 August 1986, at a meeting (see DF 26 August 1986) with EPA Region I and their contractors, IAB was tasked to review: Draft Work Plan for New Bedford Harbor (August 1986), Endangerment Assessment Work Plan New Bedford Harbor Draft Final Report (March 1986) and Final Report (August 1986), Draft Project Plan for New Bedford Harbor (April 1986), Project Management Plan for New Bedford Harbor (May 1986 and August 1986), and Modeling of the Transport Distribution, and Fate of PCB's and Heavy Metals in the Acushnet River/New Bedford Harbor/Buzzards Bay System (18 May 1984). The purpose of this review was to determine any "gaps" which the EPA approach was leaving relative to environmental considerations.

2. From an overall perspective we do not at this point find any gaps (except Floodplain and Wetland Assessment-discussed earlier in the 19 August meeting) which we could identify through our review of the subject reports. The major tasks identified in the Draft Work Plan appear to provide an adequate analysis of the dredging and disposal alternatives. Our review however, was conducted with limited knowledge of the detailed work items to be included in a number of the major tasks. In some cases the scopes of work for these items have not been developed, therefore until these detailed task items are available our review must be limited to information given in the work plans. Development of the detailed scopes of work and the interrelationship of the major tasks will require careful/continuous coordination between EPA's Project Manager and his study contractors to prevent "gaps".

3. Without much more specific information on each of the tasks shown in the work plans, comments on technical adequacy relative to the detailed work items cannot be made. However, several questions arise after review of these documents.

- a. How are technical information gaps identified and by whom?
- b. How are data synthesized into a cohesive decision making document?
- c. Where are the technical quality control points?
- d. How will State and Federal environmental laws, regulations, and Executive Orders be addressed (procedurally and technically)?
- e. To what detail will non-wetland filling alternatives be addressed?
- f. Is a bio-statistician involved in this project to review data and methods?

- g. How is the data verified? Transfer methods, collection, analyses, and reduction all have error sources.
- h. What is the extent of sedimentology/geological information of the wetland areas in the harbor?
- i. What is the extent of hydrological information in the harbor (including groundwater, tidal circulation, tidal flushing, temperature and salinity gradients)?
- j. Will the model be able to adequately assess changes (short and long term) in the existing hydrological conditions for all alternatives?
- k. Are there existing high quality aerial photographs and topographic/hydrographic maps for the harbor?
- l. How were the species picked for the food chain assessment? Are sublethal effects being assessed?
- m. Are social-economic considerations relative to each alternative being assessed?
- n. Are marine biological considerations being assessed, such as community structure, population dynamics, food chain relations, and species composition?

4. In summary, our review of the Draft Work Plan and accompanying documents have not revealed any glaring "gaps" relative to environmental considerations (except for Floodplain and Wetland Assessment-discussed earlier). Our review however, was limited to major tasks given in the documents with development of the detailed scopes to follow. There is a real danger that "gaps" will appear when the detailed scopes are developed unless the EPA Project Manager oversees their development carefully and continuously. In essence the big pieces seem to fit together as shown in the Draft Work Plan: whether the individual pieces come together remains to be seen. Finally, our review has indicated a number of questions which we feel the EPA Project Manager should consider at this time.